08-13555-mg Doc 29342 Filed 07/11/12 Entered 07/11/12 15:21:41 Main Document HEARING PATE TIME: July 19, 2012 at 10:00 a.m. (Eastern Time) RESPONSE DEADLINE: July 6, 2012 at 4:00 p.m. (Eastern Time)

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 Robert J. Lemons, Esq.

Attorneys for Lehman Brothers Holdings Inc. and Certain of Its Affiliates

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

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NOTICE OF AMENDMENT TO EXHIBIT A TO THE THREE HUNDRED SIXTEENTH OMNIBUS OBJECTION TO CLAIMS (REDUCE AND ALLOW CLAIMS)

PLEASE TAKE NOTICE that, on June 4, 2012, Lehman Brothers Holdings Inc.

("<u>LBHI</u>"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the Three Hundred Sixteenth Omnibus Objection to Claims ¹ (the "<u>Objection</u>") [ECF No. 28439], which included <u>Exhibit A</u>, identifying all claims subject to the Objection and the amounts that LBHI is seeking to reduce and allow. In order to correct certain errors contained in <u>Exhibit A</u> to the Objection, <u>Exhibit 1</u> attached hereto shall amend and replace <u>Exhibit A</u> in its entirety. Attached hereto as <u>Exhibit 2</u> is a blackline comparing Exhibit A and Exhibit 1.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Sixteenth Omnibus Objection to Claims.

PLEASE TAKE FURTHER NOTICE that notice of the amendment to Exhibit A will be served on (i) the U.S. Trustee, (ii) the Securities and Exchange Commission, (iii) the Internal Revenue Service, (iv) the United States Attorney for the Southern District of New York, (iv) the claimants listed on Exhibit A, and (v) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for the above referenced cases [ECF No. 9635].

Dated: New York, New York July 11, 2012

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc. and Certain of Its Affiliates

EXHIBIT 1

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED AMOUNT NAME CLAIM# **DATE DEBTOR CLASS DEBTOR** CLASS **AMOUNT** 1 BHATTAL, JASJIT S. 24332 09/21/2009 **Lehman Brothers Priority** \$10,950.00* **Lehman Brothers** Unsecured \$3,145,498.00 Holdings Inc. Unsecured Undetermined Holdings Inc. Subtotal \$10,950.00* 2 DAVIS POLK & 18978 **Lehman Brothers OTC Lehman Brothers OTC** \$79,345.04 09/18/2009 Unsecured \$79,345.04* Unsecured WARDWELL LLP Derivatives Inc. Derivatives Inc. **ATTN: THOMAS** OGDEN, ESO **450 LEXINGTON AVENUE NEW YORK, NY 10017** 3 DENTON SALES & 2288 01/30/2009 **Lehman Brothers** Unsecured \$10,586.33* **Lehman Brothers** Unsecured \$10,586.33 VINCENT Commodity Services Inc. Commodity Services Inc. **5 AVENUE PERCIER** PARIS, 75008 **FRANCE** GOLDFARB, DAVID 3103 02/27/2009 **Lehman Brothers** Unsecured \$17,500,000.00 **Lehman Brothers** Unsecured \$2,943,264.00 Holdings Inc. Holdings Inc. GREGORY, JOSEPH 4646^{1} 05/29/2009 **Lehman Brothers Priority** \$700,000.00* **Lehman Brothers** Unsecured \$6,771,326.00 Holdings Inc. Holdings Inc. 6 JANULIS, THEODORE 30603 09/22/2009 **Lehman Brothers** Unsecured \$16,781,475.00* **Lehman Brothers** Unsecured \$2,862,865.00 P. Holdings Inc. Holdings Inc. LESSING, STEPHEN M. 29091 09/22/2009 **Lehman Brothers** Unsecured Undetermined **Lehman Brothers** Unsecured \$5,637,916.86

Holdings Inc.

Holdings Inc.

¹ Claim No. 4646 asserts a priority claim in the amount of "\$700,000 times 25 years."

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED

MODIFIED

	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
8	LIBERTY HAMPSHIRE COMPANY, LLC, THE ATTN: OPERATIONS DEPARTMENT 227 WEST MONROE STREET, SUITE 4900 CHICAGO, IL 60606	17891	09/18/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$73,903,41*	Lehman Brothers Special Financing Inc.	Unsecured	\$73,903.41
9	LINKLATERS LLP ATTN: KAREN O'SHEA & LILY YUEN 1345 AVENUE OF THE AMERICAS NEW YORK, NY 10105	21531	09/21/2009	Lehman Brothers Holdings Inc.	Unsecured	\$86,307.20*	Lehman Brothers Holdings Inc.	Unsecured	\$86,307.20
10	MCDADE, HERBERT H., III	30536	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$2,945,697.00
11	MCGEE, HUGH	310812	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$2,401,738.00

² All of the portions of Claim 31081 are subject to the Three Hundred Sixteenth Omnibus Objection to Claims except for the portion of Claim 31081 relating to deferred compensation in the form of restricted stock units, which shall remain active on the claims register, subject to the Plan Administrator's right to object in the future.

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED CLAIM# **NAME DATE DEBTOR CLASS AMOUNT DEBTOR** CLASS **AMOUNT** 12 MIZUHO CORPORATE 12701 09/15/2009 **Lehman Brothers** Unsecured \$81,650,432,30* **Lehman Brothers** Unsecured \$88,331,476.00 BANK, LIMITED Holdings Inc. Holdings Inc. 6-7, NIHONBASHI KABUTOCHO, CHUO-KU ATTN: MASAYA NAKAFUJI TOKYO, 103-0026 **JAPAN** TRANSFERRED TO: DEUTSCHE BANK AG, TOKYO BRANCH TRANSFEROR: MIZUHO CORPORATE BANK, LIMITED ATTN: IKUO KODAMA **SANNO PARK TOWER, 11-1** NAGATA-CHO 2CHOME. CHIYODA-KU TOKYO, 100-6170 JAPAN 13 NAGIOFF, ROGER B. 23682 09/21/2009 **Lehman Brothers** Unsecured Undetermined **Lehman Brothers** Unsecured \$1,172,468.00 Holdings Inc. Holdings Inc. RICHARDS KIBBE & 15311 09/17/2009 Lehman Commercial \$76,127.46 14 Lehman Commercial Unsecured \$76,127.46* Unsecured **ORBE LLP** Paper Inc. Paper Inc. ONE WORLD FINANCIAL CENTER KENNETH E WERNER, **ESO** NEW YORK, NY 10281 Undetermined 15 TRANSFERRED TO: 19200 09/18/2009 **Lehman Brothers** Unsecured **Lehman Brothers** Unsecured \$8,476,913.00 MAT INVESTORS LLC Holdings Inc. Holdings Inc. **CHARLES MOXLEY** 1170 5TH AVE, #12B

NEW YORK, NY 10029

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED NAME CLAIM# **DATE DEBTOR CLASS AMOUNT DEBTOR** CLASS **AMOUNT** SVENSKA 4922 06/19/2009 **Lehman Brothers** Secured \$55,953,934,99 **Lehman Brothers** Unsecured \$814,056.44 16 HANDELSBANKEN AB Holdings Inc. Unsecured \$0.00 Holdings Inc. (PUBL) ATTN: MARK CLEARY, Subtotal \$55,953,934.99 **DEPUTY GENERAL** MANAGER, NEW YORK **BRANCH** 875 THIRD AVENUE, 4TH **FLOOR** NEW YORK, NY 10022-7218 TRANSFERRED TO: SVENSKA HANDELSBANKEN AB (PUBL) ATTN: MARK CLEARY. DEPUTY GENERAL MANAGER, NEW YORK BRANCH 875 THIRD AVENUE, 4TH FLOOR NEW YORK, NY 10022-7218 TRANSFERRED TO: DEUTSCHE BANK AG, LONDON BRANCH TRANSFEROR: SVENSKA HANDELSBANKEN AB (PUBL) C/O DEUTSCHE BANK SECURITIES INC. ATTN: MATT WEINSTEIN 60 WALL STREET, 3RD FLOOR NEW YORK, NY 10005 TRANSFERRED TO: DEUTSCHE BANK AG. LONDON BRANCH TRANSFEROR: SVENSKA HANDELSBANKEN AB (PUBL) C/O DEUTSCHE BANK SECURITIES INC. ATTN: MATT WEINSTEIN 60 WALL STREET, 3RD FLOOR

NEW YORK, NY 10005

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

Pg 8 of 14 LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

				ASSERTED			MODIFIED		
	NAME	CLAIM#	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
17	VANDERBEEK, JEFFREY	16478	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$61,133,734.00	Lehman Brothers Holdings Inc.	Unsecured	\$3,203,232.00
					TOTAL	\$234,056,795,73		TOTAL.	\$129,032,719,74

EXHIBIT 2

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED AMOUNT NAME CLAIM# **DATE DEBTOR CLASS DEBTOR** CLASS **AMOUNT** 1 BHATTAL, JASJIT S. 24332 09/21/2009 **Lehman Brothers Priority** \$10,950.00* **Lehman Brothers** Unsecured \$3,145,498.00 Holdings Inc. Unsecured Undetermined Holdings Inc. Subtotal \$10,950.00* 2 DAVIS POLK & 18978 **Lehman Brothers OTC Lehman Brothers OTC** \$79,345.04 09/18/2009 Unsecured \$79,345.04* Unsecured WARDWELL LLP Derivatives Inc. Derivatives Inc. **ATTN: THOMAS** OGDEN, ESO **450 LEXINGTON AVENUE NEW YORK, NY 10017** 3 DENTON SALES & 2288 01/30/2009 **Lehman Brothers** Unsecured \$10,586.33* **Lehman Brothers** Unsecured \$10,586.33 VINCENT **Commodity Services Inc.** Commodity Services Inc. **5 AVENUE PERCIER** PARIS, 75008 **FRANCE** GOLDFARB, DAVID 3103 02/27/2009 **Lehman Brothers** Unsecured \$17,500,000.00 **Lehman Brothers** Unsecured \$2,943,264.00 Holdings Inc. Holdings Inc. GREGORY, JOSEPH **Lehman Brothers** 4646^{1} 05/29/2009 **Lehman Brothers Priority** \$700,000.00* Unsecured \$6,771,326.00 Holdings Inc. Holdings Inc. JANULIS, THEODORE 30603 09/22/2009 **Lehman Brothers** Unsecured \$16,781,475.00* **Lehman Brothers** Unsecured \$2,862,865.00 P. Holdings Inc. Holdings Inc. LESSING, STEPHEN M. 29091² 09/22/2009 **Lehman Brothers** Unsecured Undetermined **Lehman Brothers** Unsecured \$5,637,916.86

Holdings Inc.

Holdings Inc.

\$4,890,398,00

¹ Claim No. 4646 asserts a priority claim in the amount of "\$700,000 times 25 years."

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED

								_	
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
8	LIBERTY HAMPSHIRE COMPANY, LLC, THE ATTN: OPERATIONS DEPARTMENT 227 WEST MONROE STREET, SUITE 4900 CHICAGO, IL 60606	17891	09/18/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$73,903.41*	Lehman Brothers Special Financing Inc.	Unsecured	\$73,903.41
9	LINKLATERS LLP ATTN: KAREN O'SHEA & LILY YUEN 1345 AVENUE OF THE AMERICAS NEW YORK, NY 10105	21531	09/21/2009	Lehman Brothers Holdings Inc.	Unsecured	\$86,307.20*	Lehman Brothers Holdings Inc.	Unsecured	\$86,307.20
10	MCDADE, HERBERT H., III	30536	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$2,945,697.00
11	MCGEE, HUGH	310813	09/22/2009	Lehman Brothers Holdings Inc.	Unsecured	Undetermined	Lehman Brothers Holdings Inc.	Unsecured	\$2,401,738.00

² All of the portions of Claim 29091 are subject to the Three Hundred Sixteenth Omnibus Objection to Claims except for the portion of Claim 29091 relating to the D.E. Shaw Oculus Fund Warrants, which shall remain active on the claims register, subject to the Plan Administrator's right to object in the future.

³ All of the portions of Claim 31081 are subject to the Three Hundred Sixteenth Omnibus Objection to Claims except for the portion of Claim 31081 relating to deferred compensation in the form of restricted stock units, which shall remain active on the claims register, subject to the Plan Administrator's right to object in the future.

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED CLAIM# **NAME DATE DEBTOR CLASS AMOUNT DEBTOR** CLASS **AMOUNT** 12 MIZUHO CORPORATE 12701 09/15/2009 **Lehman Brothers** Unsecured \$81,650,432,30* **Lehman Brothers** Unsecured \$88,331,476.00 BANK, LIMITED Holdings Inc. Holdings Inc. 6-7, NIHONBASHI KABUTOCHO, CHUO-KU ATTN: MASAYA NAKAFUJI TOKYO, 103-0026 **JAPAN** TRANSFERRED TO: DEUTSCHE BANK AG, TOKYO BRANCH TRANSFEROR: MIZUHO CORPORATE BANK, LIMITED ATTN: IKUO KODAMA **SANNO PARK TOWER, 11-1** NAGATA-CHO 2CHOME. CHIYODA-KU TOKYO, 100-6170 JAPAN 13 NAGIOFF, ROGER B. 23682 09/21/2009 **Lehman Brothers** Unsecured Undetermined **Lehman Brothers** Unsecured \$1,172,468.00 Holdings Inc. Holdings Inc. RICHARDS KIBBE & 15311 09/17/2009 Lehman Commercial \$76,127.46 14 Lehman Commercial Unsecured \$76,127.46* Unsecured **ORBE LLP** Paper Inc. Paper Inc. ONE WORLD FINANCIAL CENTER KENNETH E WERNER, **ESO** NEW YORK, NY 10281 Undetermined 15 TRANSFERRED TO: 19200 09/18/2009 **Lehman Brothers** Unsecured **Lehman Brothers** Unsecured \$8,476,913.00 MAT INVESTORS LLC Holdings Inc. Holdings Inc. **CHARLES MOXLEY** 1170 5TH AVE, #12B NEW YORK, NY 10029

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

ASSERTED MODIFIED FILED NAME CLAIM# **DATE DEBTOR CLASS AMOUNT DEBTOR** CLASS **AMOUNT** SVENSKA 4922 06/19/2009 **Lehman Brothers** Secured \$55,953,934,99 **Lehman Brothers** Unsecured \$814,056.44 16 HANDELSBANKEN AB Holdings Inc. Unsecured \$0.00 Holdings Inc. (PUBL) ATTN: MARK CLEARY, Subtotal \$55,953,934.99 **DEPUTY GENERAL** MANAGER, NEW YORK **BRANCH** 875 THIRD AVENUE, 4TH **FLOOR** NEW YORK, NY 10022-7218 TRANSFERRED TO: SVENSKA HANDELSBANKEN AB (PUBL) ATTN: MARK CLEARY. DEPUTY GENERAL MANAGER, NEW YORK BRANCH 875 THIRD AVENUE, 4TH FLOOR NEW YORK, NY 10022-7218 TRANSFERRED TO: DEUTSCHE BANK AG, LONDON BRANCH TRANSFEROR: SVENSKA HANDELSBANKEN AB (PUBL) C/O DEUTSCHE BANK SECURITIES INC. ATTN: MATT WEINSTEIN 60 WALL STREET, 3RD FLOOR NEW YORK, NY 10005 TRANSFERRED TO: DEUTSCHE BANK AG. LONDON BRANCH TRANSFEROR: SVENSKA HANDELSBANKEN AB (PUBL) C/O DEUTSCHE BANK SECURITIES INC. ATTN: MATT WEINSTEIN 60 WALL STREET, 3RD FLOOR

NEW YORK, NY 10005

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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OMNIBUS OBJECTION 316: EXHIBIT A - CLAIMS TO REDUCE & ALLOW

					ASSERTED			MODIFIED		
	NAME	CLAIM#	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT	
17	VANDERBEEK, JEFFREY	16478	09/18/2009	Lehman Brothers Holdings Inc.	Unsecured	\$61,133,734.00	Lehman Brothers Holdings Inc.	Unsecured	\$3,203,232.00	
					TOTAL	\$234,056,795.73		TOTAL	\$129,032,719.70 \$128,285,200.88	